



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ABK
F. #2016R02026

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 16, 2017

By Hand and ECF

The Honorable Roslynn R. Mauskopf
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Jesus Espinal et al.
Criminal Docket No. 17-231 (RRM)

Dear Judge Mauskopf:

The government respectfully requests that the Court “so order” the enclosed proposed stipulation concerning discovery materials that contain information related to an ongoing criminal investigation and reveal sensitive (but unclassified) law enforcement techniques, including information contained in applications and orders for wire and electronic surveillance, and evidence obtained pursuant to such applications and orders. The government submits that the proposed stipulation will enable expedited production of those discovery materials, while preserving the integrity of the ongoing investigation. The proposed stipulation and order, which has been signed by all parties, is respectfully enclosed for the Court’s consideration.

Respectfully submitted,

BRIDGET M. ROHDE
Acting United States Attorney

By: /s/
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cc: All Counsel of Record (By Email)